



Responsible Investment Policy of the C WorldWide Group

Purpose and Scope

The purpose of this policy is to describe the responsible investment policies of the C WorldWide Group.

The policy has been adopted by the Board of directors of C WorldWide Group Holding A/S and applies to C WorldWide Asset Management Fondsmæglerselskab A/S (“CWW AM”) and C WorldWide Fund Management S.A. (“CWW FM”). The management of CWW AM and CWW FM is responsible for the implementation of the policy with the assistance of the Sustainability Steering Committee of CWW AM.

CWW AM provides portfolio management services based on equity strategies (the “Strategies”) to clients globally. CWW FM acts as the management company of UCITS funds in Denmark and Luxembourg (The “Funds”). This policy applies to all Strategies and all sub-funds of the Funds (The “Sub-Funds”).

Sustainability Beliefs

Good Corporate Governance

A solid sustainability profile for an investee company begins with good corporate governance anchored within a longer-term time horizon. In order for investee companies to focus on, work with, and improve their social and environmental agenda, it requires, first and foremost, a robust governance framework.

If an investee company has a management team whose decisions are motivated by creating long-term value responsibly, it will also, all things being equal, have a more proactive approach to meeting the demands and expectations of its various stakeholders. This helps underpin the investee company’s business model, which ultimately benefits us as long-term shareholders.

Therefore, sustainable business models, high quality management teams, and responsible business practices are necessary thresholds for any investee company in our Strategies and Sub-Funds. Not only is good corporate governance a foundation to address material sustainability-related risks within the investee company itself but also throughout its entire value chain and ecosystem.

Climate Change

Climate change can result in both positive and negative ramifications for countries, sectors, and corporations. It is also an integrated part of our analysis of investee companies, including exposure to transition and physical risks and opportunities arising from the global transition to a less carbon intensive world. We analyse how company managements integrate climate change into their longer-term strategic thinking and planning, and how they sufficiently mitigate climate-related risks to ensure the long-term resilience of their business model. The analytical tools we use for this are primarily public company disclosures and direct engagement with investee companies, as well as leveraging global frameworks such as the Science-based Targets Initiative (SBTi) and the Transition Pathway Initiative (TPI).

Commitment to Ethical Business Practices

Our expectation is that all investee companies comply with international human rights principles. More specifically, all investee companies are expected to comply with the ten principles laid out in the United Nations Global Compact (UNGC) covering labour rights, human rights, environment, and corruption. In addition to our minimum requirements of UNGC compliance, additional emphasis is put on having investee companies increasingly report and disclose material developments, thereby ensuring the necessary transparency for further dialogue and monitoring.

We have zero tolerance across all Strategies and Sub-Funds regarding controversial weapons. We do not invest in investee companies that are involved in the making of or generating revenues from the following:

- Anti-personnel mines
- Biological weapons
- Chemical weapons
- Cluster weapons
- Depleted uranium munitions
- Nuclear weapons
- White phosphorus

Principle Adverse Impacts

We consider principal adverse impacts of our investment decisions on sustainability factors on an entity level and on the level of our Sub-Funds and Strategies cf. art. 4 and 7 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the “Disclosure Regulation”).

“Principal adverse impacts” (“PAI”) are defined as the most significant negative impacts of our investment decisions on sustainability factors relating to environmental, social or employee matters, respect for human rights, anti-corruption, and anti-bribery matters.

PAI indicators

The PAI indicators used to measure principal adverse impacts are set out in our PAI statements. The PAI indicators consist of a number of mandatory and voluntary indicators applicable to investments in investee companies.

The voluntary PAI indicators are selected based on an evaluation of the materiality of the potential impact measured by the PAI indicator, their relevance for the Strategies and Sub-Funds and the availability of data of sufficient quality.

We have chosen the same voluntary PAI indicators for all Sub-Funds and Strategies to achieve a robust and uniform process.

Identification and assessment of PAI's

We have developed a proprietary analysis tool to identify and assess principal adverse impacts across all mandatory and voluntary PAI indicators that we have chosen to consider. The PAI analysis tool is based on data from the investee companies and third-party service providers.

We identify PAI's based on a materiality assessment. This assessment includes, but is not limited to:

- The probability of occurrence and recurrence of the impact.
- The severity of the impact.
- Whether the impact is permanent or temporary.
- Whether the impact can be mitigated or is potentially irreparable.

The materiality assessment may differ between the different Strategies and Sub-Funds based on their investment strategies. PAI's are identified and assessed prior to the primary investment in an investee company and monitored regularly during the holding period.

Integration of PAI's into the investment decision-making process and active ownership

The PAI's of an investee company are integrated into the investment decision-making process along with other financial factors and sustainability risks.

The PAI's are also integrated into our active ownership policies and processes. Where material adverse impacts have been identified in relation to an investee company, such impacts may form the basis for an engagement with the investee company. The process for selecting issues for engagement and our process for engagement and proxy voting is described in our Engagement and Proxy Voting Policy.

Sustainability risk

Sustainability risk is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

As long-term investors the integration of all material risks including sustainability risks in our investment decision-making process and investment advice is an essential part of our investment mindset, philosophy and process. The integration of sustainability risks in the investment analysis process is anchored with and implemented by the investment team.

Further details are available in our Sustainability Risks Policy.

Screening and monitoring

Norm-based screenings

All investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period for violations of international conventions, norms and standards relating to sustainability issues such as human rights, labour rights, the environment and business ethics.

UN Global Compact

Before the initial investment in an investee company is made and regularly during the holding period we evaluate whether an investee company is compliant with the 10 principles of the UN Global Compact. The evaluation is based on screenings performed by an external specialist firm, and this screening takes into consideration the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights. The evaluation results in three statuses: Non-compliant, Watchlist, or Compliant. An engagement is initiated if an investee company is evaluated as non-compliant.

Sector Exclusions

Before an investment is made in an investee company and regularly during the holding period, we conduct screenings of the activities of the investee company to avoid investments in companies exceeding a certain level of involvement in specific activities.

Active Ownership – Engagement and Proxy Voting

As active long-term investors, active ownership is an integral part of our investment process. It is anchored directly with our investment team and is fully integrated in our investment processes



including research, stock selection and portfolio construction as well as risk management. This is consistent with our fiduciary duty to consider all relevant information and material risks in investment analysis and the investment decision making process.

Our active ownership practices include

- Direct engagement with investee companies
- Collective engagements through an external service provider
- Proxy voting

The decision to engage an investee company in relation to a specific matter and the method of engagement is made based on a proportionality consideration of a number of factors, including but not limited to:

- Size of the shareholding in the investee company, and thereby the potential impact to influence change
- Materiality of the matter
- Reliability of data
- Possibility of effecting the behaviour of the investee company
- Resources required to conduct any direct engagement.

We engage with management, other executive staff, heads of divisions and board members of investee companies either directly through meetings, calls or written communication.

Collective engagements are typically initiated based on controversies and incidents, meaning the investee company has breached or there are solid indications of being in breach with international norms or conventions. In particular cases we will also communicate or cooperate directly with other stakeholders in the investee companies to engage collectively.

Both direct and collective engagements with investee companies are documented and reported to ensure that we comply fully with applicable laws, rules, and regulations.

We exercise voting rights in accordance with agreed parameters. In general, and in a manner to discharge our fiduciary duties and avoid or address properly conflicts of interest, we will vote in favour of proposals which we believe will benefit long-term sustainable returns to shareholders.

Our key focus areas for voting include but are not limited to:

- Minority shareholder items
- Remuneration structures
- Increased disclosure and transparency
- Sustainability-related topics

Our proxy voting procedures incorporate the recommendations received from a proxy voting service provider based on a chosen proxy voting policy that emphasises sustainability aspects, and



we will generally vote in line with these recommendations. However, the portfolio managers may occasionally disagree with the voting recommendations if they are not aligned with the portfolio managers' in-depth knowledge of an investee company and its management.

For further details reference is made to our Engagement & Proxy Voting Policy.

Joined Initiatives

CWW AM has joined a number of international sustainability initiatives as outlined below.

PRI - Principles for Responsible Investment

Since 2012 CWW AM has been a PRI signatory and is thereby committed to PRI's six guiding principles.

UNGC – United Nations Global Compact

Since 2021 CWW AM has been a UNGC signatory and is thereby committed to UNGC's ten guiding principles.

Climate Action – TCFD, Climate Action 100+, Net Zero Asset Managers Initiative

Since 2020 CWW AM has been an official supporter of the Taskforce on Climate-related Financial Disclosures (TCFD), thereby annually disclosing alignment with the TCFD framework.

Since 2021 CWW AM has been a signatory to Climate Action 100+, thereby engaging with high-emitting companies.

In 2022, CWW AM joined the Net Zero Asset Manager Initiative (NZAM), thereby engaging with companies to lower GHG emissions to meet net zero GHG emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5C degrees and target the goals of the Paris Agreement.

Sustainability Reporting

CWW AM's ambition to offer a transparent and accessible reporting framework.

Quarterly Sustainability Reports

CWW AM distributes quarterly sustainability reports for most of the Strategies. The reports highlight material engagements and controversies relating to the investee companies of the specific Strategy, and addresses material sustainability matters in relation to portfolio changes. The reports also include an overview of proxy voting activity and an explanation of the most significant and relevant votes for the quarter. The quarterly Sustainability reports are available on CWW AM's websites.



Disclosure Regulation

In accordance with art. 11 of the Disclosure Regulation, CWW AM reports on the extent to which the environmental and social characteristics of each of all Strategies and Sub-Funds are met. This reporting is available on CWW AM's and CWW FM's websites.

Principal Adverse Impacts

By 30 June of each calendar year CWW AM and CWW FM publishes PAI statements, including impact data for each of the mandatory PAI indicators and the voluntary PAI indicators. Current PAI statements are available on CWW AM's and CWW FM's websites.

PRI

As a signatory to the PRI, CWW AM reports annually on its activities and progress towards implementing the six principles for responsible investment established by the PRI. The latest report is available on the Data Portal of the PRI.

NZAM

Annual progress in relation to CWW AM's commitment to NZAM is reported through the PRI module in the annual PRI assessment.

UNGC

CWW AM's progress within the ten principles is disclosed through the annual COP reporting framework.

Engagement and proxy voting

On an annual basis, CWW AM discloses how its Engagement and Proxy Voting Policy has been implemented, including a general description of voting behaviour, an explanation of the most significant votes and the use of the services of proxy advisors. The annual disclosure includes information on significant engagements and votes cast in the general meetings of investee companies. The annual report and complete proxy voting data are available on CWW AM's websites.

Climate Disclosures

CWW AM reports annually on climate topics in accordance with the recommendations made by TCFD, including disclosures on governance, strategy, risk management, metrics, and targets in relation to climate. The TCFD report is available on CWW AM's websites.



Application and review of policy

This policy applies as of 26 November 2024 and is reviewed as a minimum on an annual basis.

As adopted by the Board of Directors on 26 November 2024

Links to policies, reporting and disclosure documents

Policies

Title	CWW AM	CWW FM
Engagement and Proxy Voting Policy	Link	Link
Sustainability Risks Policy	Link	Link

Disclosure documents

Title	Strategies	Sub-Funds - Luxembourg	Sub-Funds Denmark
Prospectus / Pre-contractual disclosure cf. SFDR	Link	Link	Link
Website Disclosures cf. SFDR	Link	Link	Link

Reporting – Strategy/Sub-Fund level

Title	Strategies	Sub-Funds - Luxembourg	Sub-Funds Denmark
Annual Accounts / Periodic Disclosure cf. SFDR	Link	Link	Link
Quarterly Sustainability Reports	Link		

Reporting – Company level

Title	CWW AM	CWW FM
PAI Statement	Link	Link
PRI Reporting	Link	